

DIRECTIVE

JOB TRAINING PARTNERSHIP ACT

Number: D98-3

Date: August 28, 1998

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TO: SERVICE DELIVERY AREA ADMINISTRATORS
PRIVATE INDUSTRY COUNCIL CHAIRPERSONS
JTPD PROGRAM OPERATORS
EDD JOB SERVICE OFFICE MANAGERS
JTPD STAFF

SUBJECT: JTPA DATA REPORTING REQUIREMENTS

EXECUTIVE SUMMARY:

Purpose:

This Directive provides policy and procedures for Job Training Partnership Act (JTPA) reporting. The state reserves the right to mandate additional JTPA reporting requirements.

Scope:

This Directive applies to all California Service Delivery Area (SDA) administrative entities and to other entities contracting directly with the Employment Development Department (EDD) to operate programs funded under JTPA. These entities are henceforth referred to as subrecipients.

Effective Date:

This Directive is effective July 1, 1998, the date of issuance on the Internet. The comment period ended July 22, 1998. No comments were received from the employment and training community.

REFERENCES:

- JTPA Section 106
- Title 20 Code of Federal Regulations Section 627.425
- Training and Employment Information Notice (TEIN) 9-97, Subject: Timely and Accurate JTPA Reporting
- TEIN 5-93, and Changes 1 and 2, JTPA Standardized Program Information Report (SPIR) Instructions
- JTPA Directive D96-13, Submission of Electronically Readable Monthly and Quarterly Reports
- JTPA Directive D97-2, JTPA Close-Out Handbook
- JTPA Directive D97-15, PPFU Data Collection and Reporting
- JTPA Information Bulletin B97-100 Year 2000 (Y2K) Compliance Status Reporting

STATE-IMPOSED REQUIREMENTS:

This Directive contains only state-imposed requirements.

FILING INSTRUCTIONS:

Retain this Directive until further notice.

BACKGROUND:

The Government Performance and Results Act enacted by Congress has increased the scrutiny of publicly funded programs and consequently increased the importance of full and accurate reporting of JTPA program information. In compliance with these requirements, the Department of Labor (DOL) mandates states to submit various summary level financial and participant reports and the SPIR containing individual JTPA terminnee data.

In California, DOL requirements are met by JTPA subrecipients submitting various monthly, quarterly, and year-end summary-level reports (e.g., JTPA 10, 10E, 11, 12, and 12E reports) and individual participant-level reports to the Job Training Partnership Division (JTPD). The JTPD compiles the SDA data into statewide reports and submits quarterly and annual reports to DOL, including the SPIR.

The JTPA subrecipients are required to submit electronically readable reports (except for JTPA forms 121, 122, Title II-B Supplemental Annual Report, and JTPA Systems Year 2000 Report). (Refer to JTPA Directive D96-13.) The Job Training Automation (JTA) system maintained by the state provides subrecipients with the ability to produce and submit all of the state mandated electronic reports. The SDAs not using the JTA system are provided file formats for submitting the reports required in an electronically readable format.

To ensure that California's data are complete and timely, subrecipients must comply with the state reporting requirements. These data are used to support California's performance standard incentive process, prepare the required DOL reports, monitor Title III Governor's 40 percent project expenditure rates, and respond to requests about California's JTPA program. Also, the SPIR is the source for national performance evaluations (comparisons of states and SDAs throughout the nation) and for the state's SB 645 report card system.

Recent experience in California shows that a number of subrecipients continue to submit late terminnees for monthly postprogram follow-up purposes. Terminnee data received by the University of California Berkeley (UCB) more than 13 weeks after the termination date are too late to be included for the adult follow-up sample. Late paperwork decreases the follow-up sample, changes the local factors for the performance standards model, and understates California's performance outcomes. Additionally, late paperwork causes discrepancies between SPIR data and quarterly reports, which are used to award Title II incentive funds.

While the quality of California's data has improved, further improvements are needed to ensure the integrity of California's reporting system.

POLICY:

Subrecipients are responsible for ensuring that all reports required by the state (see Attachment 1 for the reference reports) are submitted timely and that the data reported are complete.

Monthly Reports

- Terminee data are required to be submitted monthly for postprogram follow-up by the 10th of the month following the end of the report month. All adult terminees data must be submitted in time to be included in the pool for the UCB follow-up sample.
- The JTPA 10E reports are required to be submitted by the 25th of the month following the end of the report month for selected Title III grants. (See Attachment 2 for description of required grants due on the 25th.)
- Monthly JTPA 10E reports must include current and prior year expenditure data. For those projects which are in their first year of funding, report "0" (zero) expenditures for the prior year. In the second year of the project, prior year data which are fully expended must be included.
- On the JTPA 10E, participant reporting requirements for Title III formula funds differ from Title III project funds. For Title III formula funds, subrecipients must report program year-to-date participant activity, i.e., from July 1 to current report period. For Title III project funds, subrecipients must report participant data on a project-to-date basis, i.e., cumulative activity from the inception of the project to the current month.
- The JTPA 121 and 122 forms for the Title III Rapid Response programs are required to be submitted by the 25th of the month following the end of the report month.

Quarterly Reports

- The JTPA 10, 11, and 12 are required to be submitted for all Title II programs by the 25th of the month following the end of the report quarter.
- The JTPA 10E, 11, and 12E reports for Defense Diversification, Defense Conversion, and National Reserve Account projects are required to be submitted by the 20th of the month following the end of the report quarter.
- The JTPA 10E, 11, and 12E reports for the remainder of Title III grants are required to be submitted by the 25th of the month following the end of the report quarter. (See Attachment 2 for the description of required grants due on the 25th.)

- Subrecipients must ensure that the quarterly summary participant data they submit to the state are consistent, e.g., the number of terminees reported on the JTPA 10 or 10E must match the number reported on the JTPA 11 for the same time period and grant.
- On the JTPA 10E, participant reporting requirements for Title III formula funds differ from Title III project funds. For Title III formula funds, subrecipients must report program year-to-date participant activity, i.e., from July 1 to current report period. For Title III project funds, subrecipients must report participant data on a project-to-date basis, i.e., cumulative activity from the inception of the project to the current month.
- Individual Participant Data (IPD) are required to be submitted for all Title II and Title III grants, except for Title II-B and 8 percent, by the 25th of the month following the report quarter.
- For the first, second, and third quarters, subrecipients should submit only electronic JTPA 10, 10E, 11, 12, and 12E reports, i.e., JTA transmission, modem file transfer, or diskette. For the fourth-quarter reports, one signed original hard copy report is required in addition to the electronic reports. All electronic format and signed hard copy reports need to be received by JTPD on or before the indicated deadlines. If a subgrantee faxes the hard copy reports, these faxes need to have authorized signatures and be received by JTPD no later than close of business on the program-to-date deadline date, followed by the original hard copy reports submitted by mail.

Year-End Reporting

- Final year-end participant and financial reports (JTPA 10, 10E, 11, 12, 12E and IPD) are due on or before August 20 for the prior program year for all grants except Title II-B. The latest revision of the fourth-quarter JTPA 10, 10E, or 11 reports received by August 20 (or the initial fourth-quarter report if no revision is submitted) will be used to calculate final performance standards and fund utilization (D97-13 and D97-18). Final fourth quarter year-end summary participant reports must be complete and accurate and reflect all enrollments, terminees, and associated training, services, and outcome data for the program year. (Title III projects, excluding formula funds, should be reported project-to-date.) The number of terminees and terminnee characteristics submitted on the program-to-date quarterly reports should match the terminnee records submitted on the IPD.
- The report programs that generate the IPD must be run immediately after the JTPA 10, 10E, and 11, ensuring that no additional paperwork is entered in the meantime. For JTA users, the JTPA 10s, 10Es, and 11s should be selected using report periods format (month/year) rather than (month/day/year) format.
- Electronic format (JTA transmission, modem file transfer, or diskette) and signed original hard copy JTPA 10, 10E, 11, 12, and 12E reports are required for all final fourth-quarter reports. All electronic format and signed hard copy reports must be received by JTPD on or before the indicated deadlines. If a subgrantee faxes the

hard copy reports, these faxes need to have authorized signatures and must be received by JTPD no later than close of business on the deadline date, followed by the original hard copy reports submitted by mail.

- The JTPD will notify subrecipients of errors in the initial fourth-quarter IPD and provide outlier reports for reviewing the accuracy of submitted data. Although the state will not accept a revised IPD after August 20, subrecipients may be asked to submit additional information to JTPD so that corrections may be made to the state's IPD database. Once these corrections are made, these data are submitted to DOL in the SPIR format.
- If errors in outcome reporting are identified during a review conducted by a representative at the federal, state, or local level that affect the final participant data reported by an SDA, they may be documented as findings in a report. Recommendations for corrective actions relative to these findings could include documentation of the client's name, case record number, original outcome, correct outcome, and an explanation of the changes applicable to the final year-end data previously submitted. The SDAs should not attempt to correct these errors by submitting revised electronic reports to JTPD. If a decision is made to revise data locally, subrecipients are strongly advised to maintain a tight audit trail by fully documenting the changes so that, if necessary, reconciliation to the state database can be done. A copy of the documentation should be faxed to the Data Analysis Unit at (916) 654-9586. Furthermore, should the final results of a review and any subsequent investigation demonstrate that the data on which an SDA's performance outcomes were calculated may be invalid, incentive awards received by that SDA, if any, may be subject to recapture by JTPD.
- Final year-end Title II-B participant data must be submitted to JTPD by October 25 for the Title II-B October-September program year. A Title II-B Supplementary Annual Report must also be submitted to JTPD by October 25.

Late Paperwork

- Due to federal reporting requirements and time frames, the state will not accept revised or additional terminations from SDAs after the August 20 deadline. Section 106 (j)(3) of the JTPA requires the Governor to provide DOL with information on the performance outcomes achieved by each SDA on the core standards and their eligibility to receive an incentive award. To comply with this requirement, JTPD uses the final reports received from SDAs on or before the August 20 deadline to calculate final performance outcomes and to determine the distribution of the incentive award funds. This information is reported to DOL on September 30 in the annual Performance Status Summary Report.

If a subgrantee discovers that late terminee data did not get entered in time to be included in the prior program year, the subgrantee will be required to enter the terminee's paperwork into the current program year and date the late paperwork July 1 or later regardless of when the participant actually terminated. Notes should be made to the case files documenting the reason for the late paperwork, the actual date of termination, and the date used to enter the paperwork in the current program year.

- If a subgrantee discovers that late enrollment data on participants who are currently active in the program did not get entered in time to be included in a prior program year, the subgrantee may enroll the client into the prior program year. The JTA Help Desk in JTPD can assist SDAs with that process. However, entering the enrollment data into the prior program year will result in the carry-out participant counts not equaling the carry-in participant counts. This action could result in a monitoring finding. Subrecipients must explain in the Comments Section of the quarterly JTPA 10 or 10E participant reports any inconsistencies between carry-out and carry-in participant counts and/or any differences between IPD terminnee and quarterly report terminnee counts on the final fourth-quarter reports.

Year 2000

The state will ensure that the JTA application software is Year 2000 compliant by September 1998. Subrecipients must ensure that local hardware used for JTPA reporting is Year 2000 compliant and that financial software used for expenditure reporting is Year 2000 compliant and does not result in reporting delays. The JTPA Systems Year 2000 Status Reports must be submitted quarterly. (See Attachment 2 for due dates.)

PROCEDURES

- When the reporting deadline falls on a weekend or holiday, the reports are due on the last working day **prior** to the reporting deadline.
- Subrecipients must submit zero reports on the JTPA 10, 10E, 11, 12, and 12E if no activity occurred during the monthly or quarterly report period.
- On the JTPA 12 and 12E, if a line item in a subgrant has been fully spent but the grant term is still active, the report may be marked final by indicating "Y" in Section I, G. when submitting the report. In this manner, no report is due for this line item until closeout. Revisions to final reports may be submitted; mark them with a "Y" also.
- Subrecipients using the JTA system should ensure that the closing report date is set to on or before August 20 of the current year. Otherwise, subsequent JTPA 10s, 10Es, 11s, and IPDs will not be complete.
- Subrecipients using the JTA system should ensure that the program year report begin and end dates do not overlap into other program years. If they do overlap, the reports will likely not reflect the actual activities during the specified time period.

ACTION:

- Bring this Directive to the attention of appropriate staff. This includes all entities involved in your local reporting process, including fiscal accounting and service providers.
- Review local policies and incentives for ensuring that contractors and local staff submit timely and complete data. Subrecipients must institute local policies to minimize entry of late paperwork. Consider implementing consequences for failure to comply with timely and complete reporting requirements in local policies and contracts.
- Subrecipients not using the JTA system should review and modify their local JTPA management information systems as necessary to ensure that the data submitted are consistent with this policy.

INQUIRIES:

Please direct inquiries about this Directive to Diana Samuels, Job Training Automation Customer Support Manager, at (916) 657-4343 for JTA questions; Deborah Cusimano, Data Analysis Unit Manager, at (916) 653-4292 for participant reporting questions; David Rexus, Financial Management Unit Manager, at (916) 654-8502 for financial reporting questions; Jim Scholl, Internal Support Unit Manager, at (916) 657-4610 for Year 2000 questions, or to your program manager.

/S/ BILL BURKE
Assistant Deputy Director

Attachments

JTPA REPORT DESCRIPTIONS

FORM #	REPORT NAME	SUBGRANT	TYPE OF REPORT	MEDIUM
10	JTPA Quarterly Status Report Participation and Termination Summary	Title II	Participant Report	Electronic
10E	JTPA Title III Monthly/Quarterly Participation and Termination Summary	Title III, Title III Veterans, DCA, DDP, NRA	Participant and Financial Report	Electronic
11	JTPA Quarterly Status Report Participant Characteristics Summary	Title II and III, Title III Veterans, DCA, DDP, NRA	Participant Report	Electronic
12	JTPA Summary of Expenditures Report - Title II	Title II	Financial Report	Electronic
12E	JTPA Summary of Expenditures Report	Title III, Title III Veterans, DCA, DDP, NRA	Financial Report	Electronic
121	Rapid Response Assistance Onsite Visit Report	Title III Rapid Response	Onsite Visit Report	Hard copy
122	JTPA Title III Rapid Response Batch and Monthly Expenditure Report		Financial and Batch Report	Hard copy
IPD	Individual Participant Data	Title II and III	Participant Report	Electronic
--	Supplementary Annual Report	Title II-B	Participant Report	Hard copy
PPFU	Postprogram Follow-Up	Title II and III Adults	Participant Report	Electronic
--	JTPA Systems Year 2000 Status Report	Not applicable	Status Report	Hard copy

*In addition to electronic reports, at-year-end original, signed hard copy reports are also required.

YEARLY REPORTING CALENDAR

REPORT PERIOD ENDING	DUE DATE	SUBGRANTS	REPORT FORMS
July 31	August 10 August 25	All Adult Funding Sources Title III 40% Veterans Title III Formula 60% Title III Governor's 40% Title III Rapid Response	Postprogram Follow-up 10E 10E 10E 12E, JTPA 121 & 122
Aug. 31	September 10 September 15 September 25	All Adult Funding Sources Year 2000 Title III 40% Veterans Title III Formula 60% Title III Governor's 40% Title III Rapid Response	Postprogram Follow-up JTPA Systems Year 2000 Status Report 10E 10E 10E 12E, JTPA 121 & 122
Sept. 30	October 10 October 20 October 25	All Adult Funding Sources Defense Diversification Defense Conversion National Reserve All Funding Sources exc. Title II-B and 8% All Title II Title III Formula 60% Title III Governor's 40% Title III 40% Veterans Title III Rapid Response	Postprogram Follow-up 10E, 11, 12E 10E, 11, 12E 10E, 11, 12E, Individual Participant Data 10, 11, 12 10E, 11, 12E 10E, 11, 12E 10E, 11, 12E 12E, JTPA 121 & 122

REPORT PERIOD ENDING	DUE DATE	SUBGRANTS	REPORT FORMS
Oct. 31	November 10 November 25	All Adult Funding Sources Title III 40% Veterans Title III Formula 60% Title III Governor's 40% Title III Rapid Response	Postprogram Follow-up 10E 10E 10E 12E, JTPA 121 & 122
Nov. 30	December 10 December 15 December 25	All Adult Funding Sources Year 2000 Title III 40% Veterans Title III Formula 60% Title III Governor's 40% Title III Rapid Response	Postprogram Follow-up JTPA Systems Year 2000 Status Report 10E 10E 10E 12E, JTPA 121 & 122
Dec. 31	January 10 January 20 January 25	All Adult Funding Sources Defense Diversification Defense Conversion National Reserve All Funding Sources exc. Title II-B and 8% All Title II Title III Formula 60% Title III Governor's 40% Title III 40% Veterans Title III Rapid Response	Postprogram Follow-up 10E, 11, 12E 10E, 11, 12E 10E, 11, 12E Individual Participant Data 10, 11, 12 10E, 11, 12E 10E, 11, 12E 10E, 11, 12E 12E, JTPA 121 & 122
Jan. 31	February 10 February 25	All Adult Funding Sources Title III Formula 60% Title III Governor's 40% Title III 40% Veterans Title III Rapid Response	Postprogram Follow-up 10E 10E 10E 12E, JTPA 121 & 122

REPORT PERIOD ENDING	DUE DATE	SUBGRANTS	REPORT FORMS
Feb. 28	March 10 March 15 March 25	All Adult Funding Sources Year 2000 National Reserve Title III 40% Veterans Title III Formula 60% Title III Governor's 40% Title III Rapid Response	Postprogram Follow-up JTPA Systems Year 2000 Status Report 10E 10E 10E 10E 12E, JTPA 121 & 122
March 31	April 10 April 20 April 25	All Adult Funding Sources Defense Diversification Defense Conversion National Reserve All Funding Sources exc. Title II-B and 8% All Title II Title III Formula 60% Title III Governor's 40% Title III 40% Veterans Title III Rapid Response	Postprogram Follow-up 10E, 11, 12E 10E, 11, 12E 10E, 11, 12E Individual Participant Data 10, 11, 12 10E, 11, 12E 10E, 11, 12E 10E, 11, 12E 12E, JTPA 121 & 122
April 30	May 10 May 20	All Adult Funding Sources Title III 40% Veterans Title III Formula 60% Title III Governor's 40% Title III Rapid Response	Postprogram Follow-up 10E 10E 10E 12E, JTPA 121 & 122
May 31	June 10 June 15 June 20	All Adult Funding Sources Year 2000 Title III 40% Veterans Title III Formula 60% Title III Governor's 40% Title III Rapid Response	Postprogram Follow-up JTPA Systems Year 2000 Status Report 10E 10E 10E 12E, JTPA 121 & 122

REPORT PERIOD ENDING	DUE DATE	SUBGRANTS	REPORT FORMS
June 30 Initial Fourth-Quarter Reports	July 10 July 20 July 25	All Adult Funding Sources Defense Diversification Defense Conversion National Reserve All Funding Sources excluding Title II-B and 8% All Title II Title III Formula 60% Title III Governor's 40% Title III 40% Veterans Title III Rapid Response	Postprogram Follow-up 10E, 11, 12E 10E, 11, 12E 10E, 11, 12E Individual Participant Data 10, 11, 12 10E, 11, 12E 10E, 11, 12E 10E, 11, 12E 12E, JTPA 121 & 122
June 30 Final (Revised) Fourth-Quarter Reports	August 20	All Funding Sources exc. Title II-B and 8% All Title II Defense Diversification Defense Conversion National Reserve Title III 40% Veterans Title III Formula 60% Title III Governor's 40% Title III Rapid Response	Individual Participant Data 10,11,12 10E, 11, 12E 10E, 11, 12E 10E, 11, 12E 10E, 11, 12E 10E, 11, 12E 10E, 11, 12E 12E, JTPA 121 & 122
Sept. 30	October 25	Title II-B	10, 11, 12 Title II-B Supplementary Annual Report

*When the reporting deadline falls on a weekend or holiday, the reports are due on the last working day prior to the reporting deadline.